

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**KENYATTA WHITE, JR.,**

**Plaintiff,**

**v.**

**CITY OF PHILADELPHIA, *et al.*,**

**Defendants.**

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**Civil Action  
No. 21-CV-2688**

**DEFENDANTS’ RESPONSE TO PLAINTIFF’S MOTION FOR AN ORDER  
COMPELLING DISCOVERY**

Defendants, Warden Michele Farrell,<sup>1</sup> Correctional Lieutenant Sheneka Golden-Deveaux,<sup>2</sup> Correctional Sergeant Jay Leca,<sup>3</sup> and Correctional Officer Shaniqua Roundtree (together, “Defendants”), by and through their undersigned counsel, submit this response to Plaintiff’s Motion for an Order Compelling Discovery (the “Motion to Compel”) (Doc. No. 36).

An order as requested by the Motion to Compel is not necessary. Defendants note that Plaintiff did not serve requests for discovery on Defendants prior to the filing of the Motion to Compel. Rather, the first notice of Plaintiff’s requests for discovery as referenced in the Motion to Compel was through that filing. Notwithstanding that deficiency, Defendants have, as of this submission, served written objections and responses on Plaintiff to his discovery requests, together with documents deemed responsive and relevant to the claims as set forth in the Supplemental Complaint (Doc. No. 26), which is the operative pleading in this matter. Consequently, an order compelling discovery is not required and the Motion to Compel – itself

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<sup>1</sup> Incorrectly named in the Supplemental Complaint as “Michelle Farrell.”

<sup>2</sup> Incorrectly named in the Supplemental Complaint as “Lt. Golden Devoe.”

<sup>3</sup> Incorrectly named in the Supplemental Complaint as “Sgt. Leka.”

defective given the lack of prior service of the discovery it sought – is moot.

Respectfully Submitted,

Date: October 7, 2022

/s/ Bailey Axe

Bailey Axe

Deputy City Solicitor

PA Attorney I.D. 309686

City of Philadelphia Law Department

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**Civil Action  
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**CERTIFICATE OF SERVICE**

I, Bailey Axe, certify that I caused a true and correct copy of the foregoing response to the Motion to Compel to be served via USPS as follows:

Kenyatta White, Jr. PPN # 1037217  
Philadelphia Industrial Correctional Center  
8301 State Rd.  
Philadelphia, PA 19136

/s/ Bailey Axe

Bailey Axe  
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*Attorney for Defendants Warden Michele  
Farrell, Correctional Lieutenant Sheneka  
Golden-Deveaux, Correctional Sergeant  
Jay Leca, and Correctional Officer  
Shaniqua Roundtree*

Dated: October 7, 2022